

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2022 DEC 15 PM 2: 01

UNITED STATES OF AMERICA

v.

FREDRICK CAMPBELL II, aka "Momo," and

Defendants.

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Criminal No. 2:22-cr-94 -2-3

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges:

Count One

Between in or about June 2022 to on or about August 4, 2022, in the District of Vermont and elsewhere, the defendants FREDRICK CAMPBELL II, aka "Momo," and [REDACTED] [REDACTED] and others, known and unknown to the grand jury, knowingly and willfully conspired to distribute cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 846, 841(a), 841(b)(1)(C))

Count Two

On or about August 4, 2022, in the District of Vermont, the defendants FREDRICK CAMPBELL II, aka "Momo," and [REDACTED] knowingly and intentionally possessed with the intent to distribute cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C))

A TRUE BILL

**REDACTED**

~~FOREPERSON~~

*Nikolas P. Kerest by EAPC*

NIKOLAS P. KEREST (JAO/EAPC)  
United States Attorney  
Burlington, Vermont  
December 15, 2022